

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA

v.

SHAWNA REID,

Defendant.

NO. CR 19-117-JLR

PROPOSED JOINT STATEMENT OF
FACTS

The United States of America, by and through its counsel of record, Nicholas L. McQuaid, Acting Assistant Attorney General, United States Department of Justice, and Matthew Hoff and Christina Taylor, Department of Justice Trial Attorneys, and the defendant, Shawna Reid, by and through her counsel of record, Michael Nance and Robert Gombiner, hereby submit to the Court their Proposed Joint Statement of Facts for the jury trial in above-entitled matter, scheduled to begin on July 13, 2021, before this Court.

PROPOSED JOINT STATEMENT OF FACTS

Shawna Reid is charged with obstruction of justice and making a false declaration before the grand jury, relating to statements she made to government authorities in 2017 and 2018.

In October 2001, a federal prosecutor, Thomas Wales, was shot and killed in his home in Seattle. In the fall of 2017, as part of the ongoing investigation, investigators interviewed Ms. Reid. In February 2018, Ms. Reid appeared before a federal grand jury pursuant to a subpoena and compulsion order.

1 The charges in this case concern what Ms. Reid initially told investigators, whether
2 she falsely denied making those statements at a later time, and whether she made materially
3 false statements in her testimony before the grand jury in February 2018.

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5 DATED this 29th day of June 2021.

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7 Respectfully submitted,

8 Nicholas L. McQuaid
9 Acting Assistant Attorney General

/s/Michael Nance
Michael Nance
Attorney for Shawna Reid

10 /s/Matthew K. Hoff
11 MATTHEW K. HOFF
12 Trial Attorney

/s/Robert Gombiner
Robert Gombiner
Attorney for Shawna Reid

13 /s/ Christina Taylor
14 CHRISTINA TAYLOR
15 Trial Attorney
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